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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

RODNEY OMANOFF AND NEIL VANLEEUWEN, INDIVIDUALLY AND ON BEHALF OF ALL OTHERS SIMILARLY SITUATED, Plaintiffs, vs. PATRIZIO & ZHAO LLC; P&K CPAs LLC; XINGGENG (JOHN) ZHAO; AND JOHN G. PATRIZIO, Defendants.	Case No.: 14-cv-00723-MCA-LDW

NOTICE OF MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES

PLEASE TAKE NOTICE that on January 25, 2016 at 11:00 a.m., Lead

Plaintiffs Neil Vanleeuwen and Rodney Omanoff shall move before the Honorable

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Madeline Cox Arleo, U.S.D.J., at the Martin Luther King, Jr. Federal Building and U.S. Courthouse, 50 Walnut Street, Newark, New Jersey, to enter a judgment and an Order awarding Lead Plaintiffs' Counsel attorneys' fees, reimbursement of expenses, and an award to Lead Plaintiffs.

PLEASE TAKE FURTHER NOTICE that in support of their motion, Lead Plaintiffs will rely upon the supporting memorandum of law and declarations, as well as all prior proceedings held in this action, and other such matters and arguments as the Court may consider in the hearing of this Motion.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Federal Rules of Civil Procedure, a proposed Order is attached to the Motion.

Dated: December 21, 2015   Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ *Laurence M. Rosen*
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CERTIFICATE OF SERVICE

I hereby certify that on this on the 21st day of December, 2015, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/*Laurence M. Rosen*